

2/18/97 15:12

KIEWIT MINING GROUP INC.

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Omaha, Nebraska 68131
(402) 342-2052

M/001/036

February 18, 1997

Mr. Wayne Hedberg
State of Utah, Department of Natural Resources
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Salt Lake City, UT. 84114

Dear Mr. Hedberg:

We have reviewed the Division's comments of our NOI to Commence Large Mining Operations and our Reclamation Bond Estimate. This letter will address the review comments. By March 21, 1997 we will have the NOI that we submitted on December 11, 1996, updated to incorporate any changes arising from the Division's comments and our response.

105.3 Drawings or Cross Sections.

The safety berm on the highwall will only be used during active operations to keep people or animals from falling off the face. During reclamation the berm will be removed in conjunction with the highwall reduction operation. ✓OK-aa

106.3 Estimated acreages disturbed, reclaimed, annually.

The disturbance table on page 14 has been revised and is included at an attachment to this letter. ✓OK

The estimated quantity of reject fines that will be left out of the pit is dependent upon several factors. We had to estimate the amount of ballast the UP would take, the percentage of feed that would end up as ballast, and the amount of by-product that would be sold. When making these estimates we tried to be conservative, which tended to increase the amount of reject fines. The table on page 15 of the NOI contains our estimate of the yearly reject that will be generated. This is probably on the high side since we hope to sell more than 25,000 tons of by-products. Our pit sequencing schedule shows that the lowest bench in the quarry, the 5200 level, would have advanced enough in year 16 to allow in-pit backfilling. Assuming a 20 year quarry life, material will be backfilled for approximately 4-1/2 years. At 84,000 cy/yr, this is equal to 378,000 yards total backfill. It is estimated that over a 20 year life, 315,000 cy/yr, or 6.3mm yards total will be removed from the pit. Thus the 378,000 yards to be backfilled represents 6% of the total material removed. ✓OK-aa

TONY COPY
FOR REVIEW OF RESPONSE

✓ TONY
✓ LYNN
— TOM
— WAYNE

ADJUSTED BOND
AMOUNT 2/20/97
CLARIFY & IN
VARIANCE

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106.4 Nature of materials mined, waste and estimated tonnages.

The reject fines stockpile will be reclaimed by a cut/fill operation similar to the sketch on page 3 of the bond estimate. The 167,600 cubic yards in the estimate is the amount of cut material. Only the front edge will need to be dozed since the back edge of the pile is built up against the hill. ✓OK

LYNN → 106.5 Existing soil types, location, amount

A soil sample will be taken and sent to a qualified lab to be analyzed for CEC, EC, SAR, Percent Organic Matter, Total nitrogen, Nitrate nitrogen, Phosphorus, and Potassium. As soon as we have the results they will be forwarded to DOGM and added to the soils data section of the NOI.

Stipulate → Pending results of soil analysis, The Division may require additional soil amendments for reclamation.

LYNN → OK 106.6 Plan for protecting and rededpositing soils

We will agree to seed the topsoil piles with the recommended revegetation species list prepared by DOGM.

LYNN → OK 106.7 Existing vegetation - species and amount

Page 32 of the NOI is in error and will be corrected. The correct vegetation cover is 40%.

107.1 Public safety & welfare

See 105.3. The safety berm will be reclaimed at final reclamation. ✓OK 02/22

110.2 Roads, highwall, slopes, drainages, pits, etc., reclaimed

Gina Ginouves with the BLM's Beaver River RA has been contacted regarding spreading ballast in the ROW during reclamation. The BLM would prefer that the ballast be picked up and backfilled into the pit. This only applies on BLM land. The reclamation bond estimate will be updated to reflect this. ✓OK BOND ADJUST. NEEDED

When mining is complete, the reject fines piles will contain an estimated 1.3 million cubic yards of material. Approximately 29,300 yards, or 2% of the pile, will be removed and used to backfill the settling pond and ditches. This will leave 1.27 million cubic yards in the pile. As discussed in 106.4, the pile will be regraded and the front edge will be knocked down to a 4:1 slope in a cut/fill operation. An estimated 167,600 cubic yards of material will be dozed. After the pile has been regraded to a 4:1 slope it will still contain 1.27 million cubic yards. The EA report should state that the reject fines pile will remain out of pit and be regraded. ✓OK 02/22

The BLM's Beaver River RA has been contacted regarding our plan to break up and bury concrete foundations during reclamation. The BLM has agreed with this procedure as long as the broken concrete is hauled back to the pit and incorporated into the pit regrade. ✓OK 02/22

A request for variance is included as an attachment with this letter. The variance is for two areas that will not be retopsoiled or reseeded due to the steepness of the slope. ✓OK 02/22

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110.4 Description or treatment/deposition of deleterious or acid forming material
High pH soils will initially be buried at the toe of the waste pile. When the pit has opened up sufficiently to permit backfilling, high pH soil will be backfilled into the pit. As discussed previously, it is not anticipated that in-pit backfill can occur until year 16. By this time almost all of the topsoil will already have been stripped, and the high pH soil buried in the waste pile. Very little if any high pH soil will be backfilled into the pit. The BLM has approved of these burial sites. ✓OK, 2/22

LYNN → **110.5 Revegetation planting program**
OK

We will agree to use the revised seed mix recommended by the department. Discing will not be done prior to seeding unless a soil crust has developed.

TOM → **111.2 Reclamation of natural channels**

The north drainage channel will be backfilled during reclamation. The only reason it was on the regraded surface map was to show the ditches that would be reclaimed as described in the bond estimate. The post-mining drainage pattern is shown in blue on the regraded surface map. Once the water crosses the county road it will generally follow the pre-mining pattern of west to east via small drainage channels.

R647-4-113 - Surety

The reclamation bond estimate will be updated due to the three changes previously discussed. They are: the change in the seed mix, the requirement to haul broken concrete back into the pit, and the requirement to remove railroad ballast from BLM land. These changes will be made and a revised estimate faxed to your office by 2/20/97.

It is hoped that our responses to the review comments have answered the questions that the Division had. If further explanation is needed please give me a call.

Sincerely,

TWIN MOUNTAIN ROCK COMPANY



Craig Pfingsten